

Appendix C – Submissions from trade unions, MPs, London Assembly Members, Local Authorities, councillors, rail user groups and a business:

Barking to Gospel Oak Rail User Group
Belsize and Hampstead Town Labour Party Branch
Cllr Bell, LB Lewisham
Cllr Bell, Watford Labour Group
Cllr Brabazon, LB Haringey
Cllr Chan, LB Brent
Cllr Coelho, LB Richmond upon Thames
Cllrs Cox, J King and S King, Three Rivers District Council
Cllr Cryan, LB Southwark
Cllr Davis, LB Lewisham
Cllr Demirci, LB Hackney
Cllr Dogan, LB Enfield
Cllr Durant, LB Havering
Cllr Gallagher, LB Lewisham
Cllr Gordon, LB Haringey
Cllr Hall, LB Lewisham
Cllr Huntington-Thresher, LB Bromley
Cllr Mahmood, LB Brent
Cllr Mehrban, LB Hounslow
Cllr Napier, Dover District Council
Cllr Odell, LB Harrow
Cllrs Sorba and Bell, LB Lewisham
Cllr Tatler, LB Brent
Cllr Webbe, LB Islington
Cllr Williams, LB Southwark
Florence Eshalomi AM, London Assembly Labour Group
Hackney Pensioners Convention
Joan Ryan, MP for Enfield North
Kate Osamor, MP for Edmonton
Lewisham Council
Peter Taylor, Mayor of Watford
Railfuture
RMT (sent to all Board members)
South East Rail Group
St Katherines and Wapping Labour Party
Tottenham Hotspur FC
Tottenham Hotspur Supporters Trust
Transport for All
TSSA
West Hampstead Amenity and Transport

Petitions were also received regarding/from:

Carpenders Park station
Honor Oak Park station
RMT
West Hampstead Amenity and Transport



Planned closure of ticket offices at 51 London Overground stations Comments by Barking – Gospel Oak Rail User Group

Introduction

1. This proposal by Arriva Rail London on behalf of Transport for London directly affects the Barking – Gospel Oak line only in respect of Gospel Oak station. This is because other stations on the line already have no ticket offices, apart from Barking where the ticket office is operated by c2c.
2. We have no objection in principle to the closure of Gospel Oak booking office provided the commitment to provide staff at the station from 15 minutes before the first train until 15 minutes after the last train is maintained.
3. However we believe that conditions in respect of the following matters should be imposed, and that these conditions should be standardised across all London Overground stations, **including those which already have no ticket office.**

Walk-up tickets

4. As well as full facilities for Oyster and Contactless, every station's ticket machines should be capable of issuing (for cash and for card payment) -
 - Tickets from that station to all stations on the National Rail and TfL networks
 - Tickets from any other station on the National Rail network to all stations on the National Rail network
 - Tickets / Travelcard extensions from all Boundary Zones to all stations to which such fares are available (mainly LUL and former Network South-East stations)
 - Tickets for the current day
 - Tickets for journeys commencing on any day up to four weeks ahead
 - Season tickets
5. In respect of the above we have examined in detail new ticket machines (of two different designs) recently installed at Gospel Oak and Upper Holloway, and find that these provide all the facilities listed.
6. We therefore recommend that, where not already installed, ticket machines of these types should be provided at all London Overground stations.

7. One issue for improvement with both designs of machine is that where tickets with limited route availability are offered (i.e. not Route Any Permitted), limited display space means the actual route allowed can only be read by selecting that particular ticket. Whilst this does not commit the passenger to buying that ticket, it does make the process of selection slow and cumbersome as it necessary to click back and forth between screens before deciding what to purchase. We therefore recommend that where the full route is not at present displayed within the initial display, that this be modified to allow the full route to scroll across.

Advance Purchase tickets

8. We note that the new design machines do not offer Advance Purchase (AP) tickets. We doubt that it would be desirable for them to do so, because the need for passengers to consider multiple choices of times, days, and fares would result in very long transaction times which would disadvantage other people waiting to use the machines.
9. Instead we consider that station staff should be provided with full information on their electronic devices to enable them to give correct advice about which telephone and non-fee charging websites passengers can use to buy AP tickets. It would be helpful for the station ticket machines to be modified so that for any journey for which AP tickets are offered this information is displayed with advice to ask staff for details of how to buy them.

Refunds / Delay Compensation

10. Station staff must be able to provide passengers with accurate advice on how to obtain refunds for unused tickets (including any administrative fees) and how to obtain delay compensation.

Recent Refunds

11. In the particular case where passengers buy a ticket (or click-in on Oyster or Contactless) and then decide not to travel because they find there is a delay to the service, station staff must be able (as a ticket office can at present) to give an immediate refund on request by whatever means the passenger paid for the ticket.

Railcards on Oyster

12. Station staff should have the facility to load Railcard details onto an Oyster card, as already applies on LUL.

Jerry Gold
pp Glen Wallis
Secretary
(020) 8529 2361; 07789 791224
info@barking-gospeloak.org.uk

11th October 2018

Sandra Ambo

From: Gail Brackett <gailbrackett@hotmail.com>
Sent: 08 October 2018 20:51
To: Consultations
Subject: Overground Ticket Office Closures

Dear Sir/Madam,

Transport for London has plans to close virtually all ticket offices at all stations on the London Overground.

This would cause considerable inconvenience to people needing to buy tickets and those seeking information from station staff.

We demand that the mayor and TfL put a stop to this inappropriate and unnecessary proposal.

Yours faithfully,

Gail Brackett,

Branch Secretary

on behalf of Belsize and Hampstead Town Branch

Hampstead and Kilburn Constituency Labour Party

Sandra Ambo

From: CLLr_paul.bell@lewisham.gov.uk
Sent: 25 September 2018 10:18
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that I

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely
Cllr paul bell

To London TravelWatch,

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations

I write to you on behalf of Watford Constituency Labour Party and that our party understands that Arriva Rail London and TfL are planning to close ticket offices in stations on the Overground network.

Although we welcome the opportunity to express our views on whether we would like these ticket offices to remain open or not. We are steadfastly opposed to the proposed closure of ticket offices at Carpenders Park and Watford High Street.

Our party believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Local indicators show that a clear majority of our constituents still prefer to buy from the ticket office rather than from a ticket machine. Both stations service a diverse group of passengers with differing needs. Watford High Street in particular, is widely used to service our local premier league football club which attracts large numbers of both home and away crowds.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly cause potential risks to staff and passengers in overcrowded situations such as Saturday afternoon football.

If these changes go ahead we believe that Watford residents would experience more delays and concourse congestion and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling.

Both Carpenders Park and Watford High Street are isolated platforms and that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take our concerns into consideration when considering this statutory consultation.

Yours sincerely

Nigel Bell

Leader Watford Labour Group

Sandra Ambo

From: Cllr Brabazon Zena <Zena.Brabazon@haringey.gov.uk>
Sent: 11 October 2018 20:39
To: Consultations
Subject: White Hart Lane and Bruce Grove Station loss of staff

Dear Travel Watch

I am writing to respond to the consultation regarding removing staff from several London Overground stations. I am deeply opposed to this, as I believe staff are needed to support travellers. They provide safety and security. In particular, I oppose the loss of staff at both White Hart Lane and Bruce Grove stations. My concerns relates to everyday travel, but especially to the times when Tottenham Hotspur will be playing home games and when they host large events and gigs. The new stadium has 62000 capacity – a huge increase on the previous 38,000. This will place huge pressure on all transport services and I doubt that the extended White Hart Lane or Bruce Grove stations will be immune from this. Having staff at the stations during these times is vital for public safety . Please retain staff at these stations.

Zena Brabazon

Cllr Zena Brabazon
Labour Member for Harringay Ward
Cabinet Member for Civic Services

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Sandra Ambo

From: chan.jun.bo@gmail.com
Sent: 10 October 2018 19:54
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that I

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely
Cllr Jumbo Chan

Sandra Ambo

From: Coelho, Avril (Cllr) <Cllr.A.Coelho@richmond.gov.uk>
Sent: 02 October 2018 20:20
To: Consultations
Cc: Ehmann, Alexander (Cllr); Roberts, Gareth (Cllr)
Subject: Ticket office closures consultation

Dear London Travelwatch,

I would like to add the following comment to the consultation on the closure of overground ticket offices:

Those of us who have a Disabled person's freedom pass are covered for some of our train journey and only need to purchase mainline extension tickets. The ticket machines do not tell us which station on each journey is the cut off for the freedom pass and where the Disabled person's railcard journey should commence from and return to. We rely on ticket office staff for this. There are rare occasions when ticket office staff don't know and staff near the machines if the office is closed don't know either and we end up paying extra unnecessarily. For most journeys however, we rely on ticket offices to purchase the correct tickets and not pay an unnecessary extra overlap in journey fare when the freedom pass covers part of the journey already and the railcard should be used to purchase a ticket for only part of the journey whether one way or return. I implore you not to close these for the many people who rely on public transport due to disabilities therefore live and travel in cities like London.

My response is both in a personal capacity and as an executive officer of the Lib Dem Disability Association.

I have copied in our borough cabinet member for Transport, Highways and Air Pollution Cllr Ehmann.

I have also emailed the other way copying in Caroline Pidgeon who is my GLA Transport Committee representative.

Kind regards,

Cllr Avril Coelho
Hampton North ward
Cllr.A.Coelho@richmond.gov.uk

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Sandra Ambo

From: Cryan, Stephanie <Stephanie.Cryan@southwark.gov.uk>
Sent: 04 October 2018 17:30
To: Consultations
Subject: Proposed closure of ticket offices at Rotherhithe and Surrey Quays Stations

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations, including Rotherhithe and Surrey Quays in my ward. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, **Rotherhithe**, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, **Surrey Quays**, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that residents I represent:

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Rotherhithe and Surrey Quays stations are due to see an increase in use with the planned regeneration at Canada Water. The Mayflower 2020 celebrations will see an increase in tourist visits predominantly using Rotherhithe station and there will be an increased demand for a ticket office.

Please take my concerns into consideration when considering this statutory consultation.

Cllr Stephanie Cryan
Cabinet Member for Housing Management and Modernisation
Labour and Co-operative Party Member for Rotherhithe Ward.

Tel: 020 7525 0247
Mob: 07985116251

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Sandra Ambo

From: CLLR_sophie.davis@lewisham.gov.uk
Sent: 09 October 2018 14:43
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that I

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely
SOPHIE DAVIS

Sandra Ambo

From: Feryal Demirci <feryal.demirci@hackney.gov.uk>
Sent: 12 October 2018 15:53
To: Consultations
Subject: London Overground Ticket office closure

Dear London Travelwatch

I write in connection with the above proposals on behalf of London Borough Hackney.

We believe if public transport is to be promoted across London to meet Mayor of Londons transport aspirations, then the entrance to the station has to be the focal point to the start of the journey. Linked to that are concerns over safety, of our residents and the LO staff. Visibility of staff provides reassurance that the Overground is a safe place to travel. At present staff in ticket offices provide this visibility and my Council would object to any measures which (directly or indirectly) reduce this as the current proposals would seem to imply. No information is supplied on staffing levels for stations in Hackney - current and and proposed.

With the exception of London Fields, all the Council's stations have ticket offices. We are aware that Stamford Hill has been closed due to structural issues and this has resulted in queues building up at times for the ticket machines. We fear that with further closures this could become the norm at other stations.

As well as issuing the full range of tickets, ticket offices can also deal with the issuing of annual season tickets, refund Oyster deposits and unused credit and top up Oyster credits for small amounts. This is important to many on low wages. Ticket offices can also print out Oyster journey histories. With the closure of the ticket offices these facilities will be lost.

Although it is accepted that the self-service ticket machines used on London Overground do issue a full range of tickets (including to any NR station) and zone boundary extensions to many groups such as people with disabilities (some not apparent) these are still difficult to use. Our Mayor Philip Glanville and I would wish to receive assurances with any changes that there would be staff on hand at all times to offer assistance with their use.

Annual Season Tickets

Although it is accepted that the popularity of Oyster products has reduced demand for annual season tickets, a sizeable number of passengers nevertheless still use these. In addition LO ticket offices sell 'point to point' annual tickets. With the closure of ticket offices on the London Underground the only place to purchase these (other than on-line) is at a ticket office or at a Visitor Centre. There are none of these in Hackney. I would therefore ask how is it proposed to deal with this issue ?

Staffing

The proposals state that London Overground operates with a staffing model that guarantees that a member of staff will be on each managed station. There is no information to suggest at what times the stations have more staff. One member of staff alone would not be able to deal with gateline problems, assistance with passengers and help with buying a ticket. The proposals need to explain how this would be mitigated.

Reliability of gatelines

Although information on unscheduled booking office closures and ticket machine performance has been submitted no information is supplied on reliability of the gatelines. It is often the case that these break down (Hackney Central being an example) and dangerous levels of overcrowding at several of our station means diverting staff to dealing with these issues would take them away from the ticket machines where they would be assisting passengers. How would this problem be addressed ?

Ticket machine availability

The proposals refer to reliability issues with the ticket machines and that two types are in use. It is mentioned that at least one of each type will be installed at each location. We would point out that this is not the case at present in all locations.

Booking hall congestion

At a number of locations the booking office spaces are cramped and congestion regularly occurs on the concourse. The location of the existing booking offices allows for the queues to be managed. The proposals do not show any plans for the location of any additional ticket machines and what future use will be made of the redundant space. The Council would suggest, as a pre-requisite that if the closures go ahead that these should be linked to a programme of improvements to help passenger flows and that machines should not be located in proximity to gatelines where these could restrict entry and exits.

In conclusion, the Council considers that these proposals, as currently submitted lack detail and the necessary information for proper assessment. Unless these issues can all be satisfactorily addressed the Council must formally object to them.

Yours sincerely

Cllr Feryal Demirci
Deputy Mayor and Cabinet Member for Health, Social Care, Transport and Parks
Labour Councillor - Hoxton East & Shoreditch
Tel: 020 8356 3270
Email: feryal.demirci@hackney.gov.uk

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Cllr Feryal Demirci
Deputy Mayor and Cabinet Member for Health, Social Care, Transport and Parks
Labour Councillor - Hoxton East & Shoreditch
Tel: 020 8356 3270
Email: feryal.demirci@hackney.gov.uk

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By email to:

enquiries@londontravelwatch.org.uk

Please reply to: Dominic Millen
Civic Centre
Silver Street
Enfield
EN1 3XD

E-mail : dominic.millen@enfield.gov.uk

My Ref LBE Response to LO Closures

Date : 24/09/2019

London Overground Proposals to Change Station Ticket Office Provision

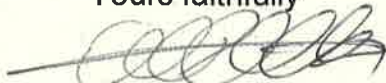
This response is made on behalf of the London Borough of Enfield whose residents will be affected by the proposed changes at Bush Hill Park, Silver Street, Southbury and Turkey Street stations.

Whilst there is a clear rationale behind the changes, which involve a number of ticket office closures, alongside the installation of additional ticket vending machines and continued staffing of stations, LB Enfield residents have concerns about:

- The availability of non-standard ticketing products, for example rail cards, which cannot be purchased online or via automatic ticket machines.
- The reduction in overall staffing levels at stations and any resultant drop in customer service levels.
- How the station staff will prioritise their work; for example, on a busy station a customer might require assistance to board a train, whilst another needs a ticket for immediate travel.

Given that these proposals are still in the early stages, prior to any firm commitment, we would expect there to be extensive local consultation to better understand if the proposals are appropriate in a particular location.

Yours faithfully



Councillor Guney Dogan
Cabinet Member for Environment, London Borough of Enfield

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Sandra Ambo

From: david.durant@havering.gov.uk
Sent: 01 October 2018 09:41
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

in general I think it a mistake to remove the personal touch from our public services and doing so can be a false economy, particularly if there is no particular need to do so, after I was informed by an auditor that tlf have over £11 billion in reserves.

I would also point out that since buses went cashless there is now over a massive amount of credit on oyster cards (over £100m) that is carried over every year. ways should be found to access this credit.

Sincerely
Cllr David Durant

Sandra Ambo

From: CLLR_AISLING.GALLAGHER@LEWISHAM.GOV.UK
Sent: 01 October 2018 14:42
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

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- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely
CLLR AISLING GALLAGHER

Sandra Ambo

From: Cllr Gordon Ruth <Ruth.Gordon@haringey.gov.uk>
Sent: 10 October 2018 17:39
To: Consultations
Subject: Proposed closure of ticket offices including Bruce Grove and White Hart Lane

Dear Sirs,

I wish to object to the proposed closure of ticket offices across London. I am a councillor in Haringey and in particular I want to press for the retention of the ticket offices at Bruce Grove and White Hart Lane Station.

The soon to be opened 62,000-seater stadium at White Hart Lane as the home for Tottenham Hotspurs is likely to create severe disruption to traffic in the Tottenham area. When matches (Premiership and NFL games) are due, Tottenham High Road and some other minor roads will be closed and fans are to be encouraged to use public transport. Bearing this in mind, I cannot perceive of a worse time to close ticket offices at these stations. Maintaining fully-staffed ticket offices at these stations is vital to the health and safety of passengers, given the anticipated overcrowding and high volume expected once the stadium opens.

I believe the proposed closure of these offices is short-sighted and foolhardy given the explosion of passenger traffic anticipated through these Tottenham stations.

Regards,

Ruth Gordon

Cllr Ruth Gordon
Labour Member for Tottenham Hale Ward

Call Mobile: 07976974532 for appointments or

Email Ruth.Gordon@haringey.gov.uk

Surgeries: Every 4th Saturday in the month at Marcus Garvey Centre, 1 Philip Lane, Tottenham. N15; and every 3rd Saturday in the month (rota basis) The Engine Room, Unit A, Eagle Heights, Lebus Street, Tottenham N17.

"Whilst I will treat as confidential any personal information which you pass on, I will allow authorised staff to see the information if this is needed to help and advise you, and may pass all or some of the information to agencies or council officers if this is necessary to help your case. I may wish to write to you from time to time to keep you informed of related issues that you may find of interest. Please let me know if you do not wish to be contacted in this way."

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Sandra Ambo

From: Cllr_alan.Hall@lewisham.gov.uk
Sent: 25 September 2018 09:34
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

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- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely
Cllr Alan Hall



LONDON
11 OCT 2018
TRAVELWATCH

Councillor William Huntington-Thresher
Portfolio Holder for the Environment & Community Services
LONDON BOROUGH OF BROMLEY

London Travel Watch
169 Union Street
London, SE1 0LL

9th October 2018

Dear Sir/Madam

London Overground Customer Service Modernisation

The London Overground offers an important service to residents in the North West of the London Borough of Bromley and has been a success story in recent years.

As a Council we recognise that customers want high quality customer service and efficiency, but over time technology is changing the way we travel. I am therefore keen to see modernisation of the London Overground network to ensure that staff are where passengers need them most; so they can provide speedy assistance to passengers, particularly those with additional needs. So I support the proposals put forward by London Overground. However, mindful of some of the experiences on the London Underground network, I would like to receive more information please on the contingencies in place in the event of staff unavailability e.g. due to sickness, and additional infrastructure such as CCTV and call points.

I am mindful of the need to consider appropriate staffing at Crystal Palace for special events to ensure that it is appropriate for the volume of passengers coming to the area, perhaps for the first time, to a special event.

We will of course monitor the implementation of the modernisation programme and reserve the right to support residents should issues arise.

Yours sincerely

P.P. Cllr William Huntington-Thresher

LONDON
09 OCT 2018
TRAVELWATCH

Hackney Pensioners' Convention

Chair – Paul Higgins, Secretary Nigel Gansell
Treasurer – Jonathan Malins-Smith

For the attention of
Campaigns Director,
LONDON TRAVELWATCH,
169 Union Street, SE1 OLL

October 6th, 2018.

Dear Campaigns Director,

**RE PROPOSED CLOSURE OF 51 BOOKING OFFICES ON LONDON
OVERGROUND BY ARRIVA LONDON /**

The Convention, at its general meeting held earlier this month decided to back the campaign organised by RMT union to safeguard the guards on the Southern Trains network with a motion and support to Mick Cash, Gen Sec of RMT.

Unfortunately I was unaware of the planned closure of ticket offices on LONDON OVERGROUND until I read it the following day of our meeting in the ISLINGTON TRIBUNE newspaper.

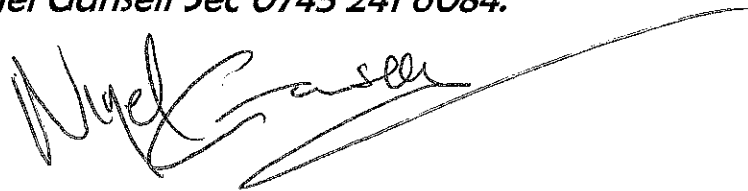
I perused your website and spotted the Consultation procedures run by TRAVEL WATCH to oppose the proposals by ARRIVA LONDON.

I am unclear whether this letter will be enough to voice HPC concerns and to back your Campaign to keep the ticket offices fully open to the elderly, disabled etc.

Our Chair Mr Paul Higgins and myself have been railways fans and supporters over many many years. We are planning a general meeting in the New Year on local travel problems in LB of Hackney and pan-London etc. If you would like to support us and even attend our next meeting [Leaflet is enclosed.] please let me know. Regards,

Yours sincerely

Nigel Gansell Sec 0743 241 6084.



*ps. Do you have any stickers,
Badges, you could supply
us with ?*

Sandra Ambo

From: Cllr.arshad.mahmood@brent.gov.uk
Sent: 25 September 2018 10:17
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

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- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely
Arshad

Sandra Ambo

From: shaida.mehrban@hounslow.gov.uk
Sent: 25 September 2018 10:36
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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Please take my concerns into consideration when considering this statutory consultation.

Sincerely
Shaida Mehrban

Sandra Ambo

From: Cllr-Ann.naPier@dover.gov.uk
Sent: 27 September 2018 13:20
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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Please take my concerns into consideration when considering this statutory consultation.

Sincerely
Cllr Ann Napier

Sandra Ambo

From: Phillip.odell@harrow.gov.uk
Sent: 25 September 2018 09:58
To: Consultations
Subject: Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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Please take my concerns into consideration when considering this statutory consultation.

Sincerely
Phillip odell

Ms Janet Cooke
Chief Executive
London TravelWatch
169 Union Street
London
SE1 0LL

4 October 2018

Dear Ms Cooke,

There are four overground stations in Brent that will be adversely affected by the proposed ticket office closures; Brondesbury, Brondesbury Park, Kensal Rise and Kilburn High Road. This proposal will have an impact on Brent residents and workers.

The staff at London Underground stations play a crucial role in not only providing services, but invaluable assistance and support to commuters. I would also seek assurance that these proposals would not see a reduction in staff or a dilution of employee's terms and conditions. I would also need assurance that the support and assistance staff currently provide is maintained.

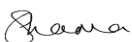
I am concerned over the timing of the proposed ticket office closures. While new Ticket Vending Machines (TVMs) will be rolled out at each location, it is not clear from the proposal whether the ticket office will be closed prior to, or after the TVMs have been installed. The lack of an operating ticket office and an available TVM means passengers travelling through these stations will not have access to the same level of service as passengers at other London stations with a ticket office available. This is unacceptable to Brent Council and Brent residents. It raises concern under the Equality Act 2010 to prevent and eliminate discrimination, promote equality and equal opportunities, and foster good relations between people with different protected characteristics. It's not unforeseeable that residents living near to one of the affected stations, who may have impaired mobility, would not be able to purchase certain ticket types without a ticket office or improved TVMs at these stations. Whilst we do support the principle that more than one type of TVM is proposed to ensure service is maintained at all times the current proposal would place these residents at an unacceptable disadvantage to residents near other London stations which have reliable TVMs and/or a ticket office.

For this reason, Brent Council is unable to support the ticket office closures until further detail on when the TVM programme and ticket office closures will take place.

I trust this response has been of some assistance, however if you have any questions, please feel free to contact our Transport Planning Manager, Rachel Best, on 020 9387 5249.

Thank you for your consideration.

Yours sincerely,



Cllr Shama Tatler
Cabinet Member for Regeneration, Highways and Planning



Councillor Claudia Webbe

Executive Member for Environment and Transport

Labour Member for Bunhill



Ms Janet Cooke
Chief Executive
London TravelWatch
c/o consultations@londontravelwatch.org.uk

Town Hall
Upper Street
London N1 2UD

W www.islington.gov.uk

PA: Amanda Russell

T: 020 7527 3051

E: Claudia.Webbe@Islington.gov.uk

5th October 2018

Dear Ms Cooke,

Re: Planned closure of ticket offices at London Overground stations

I am writing to you as the Executive Member for Environment and Transport for Islington Council concerning the proposals by Arriva Rail London to close 51 ticket offices at London Overground stations across London.

Islington Council is committed to making our borough a fairer place for all. This includes working with Transport for London (TfL), the Mayor of London and others to deliver a transport network that is sustainable, accessible and genuinely affordable for all local people. Islington has led the way in championing the rights of disabled, elderly and more vulnerable people to be able to access London's transport network, most notably through our successful efforts to require TfL to fully consider equalities implications from proposed changes following the potential 8-month closure of Caledonian Road tube station in 2016.

Arriva's proposals, that are currently being consulted upon, would see the ticket offices at Canonbury Station and Caledonian Road & Barnsbury Station in Islington closed, affecting around 4.6 million passengers each year. Whilst Islington residents will also be affected by other ticket office closures across London, in particular on the Gospel Oak – Barking line, Richmond – Stratford line and Highbury & Islington – West Croydon line, my response to the consultation concentrates on the stations in Islington.

I am concerned that this further cut in services for passengers on the London rail network will have a particularly negative impact on disabled, elderly and other vulnerable passengers. I am also seeking assurances that these proposals would not lead to a reduction in the number of staff employed, the hours available to them to work and that the proposals will not lead to other negative changes to employees' terms and conditions.

Ticket offices, and the staff who work from them, provide important advice and support for passengers. Whilst the ticket offices at the stations in Islington that are proposed to be closed sell relatively few tickets per day, the consultation document does not provide any measurement of the

advice and support that staff in these offices provide. I believe the consultation document provides an incomplete picture of the importance of ticket offices to passengers by not including any measure of their performance other than the number of tickets sold.

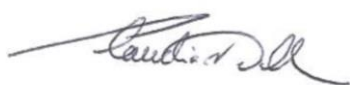
As I am sure you will agree, the reassuring presence of a staffed and open ticket office on a station is important for many passengers, particularly more vulnerable people, as the office is a fixed location where they know they can go for assistance. The consultation document suggests that staff will be more visible if the ticket offices are closed. However, given that a station may only have a single member of staff on duty, it is highly likely that not all passengers would be able to access support if they cannot locate the member of staff at the station, or if they are on an alternative platform, for example. A staffed ticket office removes this uncertainty and is reassuring to many passengers.

Similarly, whilst the installation of ticket vending machines at stations is welcome, this should be in addition to staff being available to help passengers. Without staff assistance, some passengers may be overcharged for tickets by selecting the incorrect options on the machines, or be deterred from traveling altogether if they cannot receive advice from a member of staff about tickets or routes. Having an open and staffed ticket office avoids both of these issues and, therefore, by closing these offices, passengers would be receiving a reduced service.

I would welcome staff being more visible on stations, but I would strongly argue that this should be delivered through an increase in staff numbers, rather than by closing ticket offices. I would strongly urge Arriva to consider adding additional staff to stations, as I understand there are currently over 100 vacancies across the London Overground for positions at stations. The number of vacancies is particularly concerning given the 42.5% increase in violent crime at 36 stations across the network. I am concerned that closing ticket offices would also make it harder for staff to monitor CCTV images, as they would be away from terminals whilst on the station. Passengers need to feel safe when using the transport network, and a visible staff presence and an open ticket office can provide such reassurance, whilst also helping to prevent and detect crime.

The London Overground plays an important part in the London travel network, helping Islington residents to travel to work, health appointments, school and to visit friends and family across the city. It is vital that we ensure that it remains truly accessible to all passengers, and it is for that reason that I would strongly argue against the proposed ticket office closures as outlined in this consultation.

Yours sincerely,



Councillor Claudia Webbe
Executive Member for Environment and Transport

Cc – Sadiq Khan, Mayor of London
Heidi Alexander, Deputy Mayor for Transport

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely
CLLR BILL WILLIAMS

Statutory Consultation response to Arriva Rail London's proposal to close 51 ticket offices

We are the Labour district councillors representing South Oxhey and are responding in respect of the Statutory Consultation into Arriva Rail London's proposal to close 51 ticket offices on the London Overground.

The nearest station to South Oxhey is Carpenders which has served the area since the estate came into being in the 1950s. Residents have thus been used to a ticket office at the station from then until now.

The proposal to close the ticket office does not, in our view, sit well with their stated commitment to "the highest levels of customer service". The perception from South Oxhey residents is that it is a retrograde step and in all likelihood probably a done deal, no matter what objections are raised.

We are unsure as to what the document refers to as "the emerging customer need" means in reality. This is unclear gobbledegook. Have passengers besieged the train operator with demands to shut the ticket office at Carpenders Park? We think not.

We note that only three months' figures for Ticket Vending Machine Availability have been supplied, presumably with the intention of providing reassurance that tickets can still be purchased using them. This seems to us to be placing an over-reliance upon statistics derived from what is, after all, a relatively short time span.

Data supplied does however conclusively show that on weekday morning peaks that Carpenders Park is one of the busier ticket offices of those threatened with closure. This is, in fact, highlighted and accepted by Arriva Rail.

The consultation document is extremely weak in detail when it states that a "member of staff will be on each managed station from 15 minutes before the first train in the morning until 15 minutes after the last train in the evening." The document states that Arriva Rail will be penalised financially if this condition is not met, but actually passengers will be the real losers. It is all somewhat skewed and focuses on the downside for the train operator never mind the so-called "customer".

Further, there is no comfort to be gained from this statement in terms of what that staff member in situ will actually be trained and available to do.

The document lists a number of vagaries; staff will be available to "support customers", provide "a station presence", engage in a "casual interaction", provide "necessary information" and "support a passenger who requires additional assistance to complete their journey". At no point is it even remotely suggested the staff member will be able to sell a ticket, or will be trained in use of the ticket machines which, in any event, may go on the blink. A simpering manner and smiling sweetly just doesn't cut the mustard.

Carpenders Park station has an island platform with a long ramp leading to it thus not affording expeditious access to the street. It clearly benefits from presently having a fully functioning and staffed ticket office together with a person patrolling the platform. Again the document is unclear

as to just how many staff there will be at the station at any given time. Will it be the same, greater, or fewer than now? Ominously the document fails to state what the level will be.

There is a significant elderly population served by the station which straddles both the community of Carpenders Park and the larger South Oxhey area and population. The ability to purchase a ticket from a human being and be served at a counter rather than being potentially at the mercy of a faceless ticket machine is a great comfort to many.

We submit that there are a considerable number of unexplained issues that arise from the publication of the consultation document which call into question the wisdom of closing the booking office and there is a failure to provide a compelling case for just such an outcome.

Given the unanswered questions and it would appear, an unseemly and hurried consultation period, when these proposals have been months in the making, we respectfully submit that the case for closure is not proven and that Arriva Rail London should either withdraw their proposals or see them hit the buffers.

We are implacably opposed to the booking office closure at Carpenders Park station and in doing so represent the voice of South Oxhey residents whom we are elected to serve.

Councillors Stephen Cox, Joan King and Stephen King

From: Bell, Cllr Paul [mailto:Cllr_Paul.Bell@lewisham.gov.uk]
Sent: 27 September 2018 17:14
To: Sorba, Cllr Luke; Mouncey Simon (ST)
Cc: Damien Egan, Mayor of Lewisham; McGeevor, Cllr Sophie; Dacres, Cllr Brenda; Moss, Simon; Crush, Alexandra
Subject: RE: Consultation on closure of London Overground ticket offices

I totally agree with Cllr Sorba.

Best wishes,

Cllr Paul Bell
One of the three Labour councillors for Telegraph Hill Ward
Cabinet Member for Housing

Telephone: 020 8314 7047
Twitter: @paulbell1971 | Web: <http://www.paulbell.org>

From: Sorba, Cllr Luke
Sent: 20 September 2018 16:29
To: Mouncey Simon (ST)
Cc: Damien Egan, Mayor of Lewisham; McGeevor, Cllr Sophie; Dacres, Cllr Brenda; Moss, Simon; Crush, Alexandra; Bell, Cllr Paul
Subject: Re: Consultation on closure of London Overground ticket offices

Dear Simon

Thank you for the detailed notice of the plans and upcoming consultation.

May I record straight away my complete opposition to the closure or reduction in hours of any staffed ticket office in Lewisham.

In my view, having real human beings is an integral part of the public service mandate of London Overground. As well as selling tickets, the staff offer advice on travel and help with the regular automated payment problems. They also provide visible reassurance and practical safety including on the spot First Aid opportunities in a place where the stress and misery of commuting is growing.

I am entirely against the direction we are going in terms of greater automation in those public sector duties that should be customer facing. I do not want my constituents inhabiting a ghostly world of machines run by unaccountable AI generated programmes and becoming increasingly alienated from the organisations they pay go to serve them, such as Arriva and TFL. There is more to society than ever greater financial "efficiency". Relentless dehumanization of where sympathetic and professional actual people used to be available will have very ill effects on mental wellbeing and social cohesion.

Best wishes

Luke Sorba

Councillor for Telegraph Hill Ward

Sent from my iPhone

On 20 Sep 2018, at 12:08, Mouncey Simon (ST) <Simon.Mouncey@tfl.gov.uk> wrote:

Dear all, London TravelWatch (LTW) has started an independent public consultation on closing London Overground ticket offices. London Overground is operated on our behalf by Arriva Rail London (ARL) and it is carrying out a statutory consultation at the same time

Background

ARL's Customer Journey Modernisation programme is a key part of its contract with us. It was announced in September 2017 and will deliver radical changes to the way London Overground stations operate, allowing staff to provide better customer service by being more visible, accessible, and responsive. The changes, if it is decided to go ahead with them, would improve how information is provided to customers, modernising the process of buying tickets and reflecting changes to how people prefer to pay for their travel. The programme would also allow a change in the London Overground permanent staff recruitment model, moving away from the previous reliance on agency staff and, at the same time, simplifying job grades and providing more job variety and training. All stations would, as now, remain staffed at all times while trains are running. The changes would result in an annual saving of up to £5m, which is assumed in our 2017 Business Plan

ARL is carrying out a statutory consultation with its stakeholders such as the DfT and staff. The details of staffing changes would not be confirmed until the proposals have been decided on and until negotiations with trade unions have been completed. ARL's engagement and consultation plans incorporate lessons learned from London Underground's Fit for the Future Stations programme, including early engagement with staff and unions and consulting with LTW which has already happened (and been reported on in the media). ARL has visited all the stations as part of a programme of joint reviews with trade union representatives, speaking to station staff to get their input and identifying any specific local safety and security issues that would need to be taken into account before any changes are implemented

LTW is carrying out the public consultation on ARL's behalf as it carried out a review, commissioned by the Mayor, of changes to staffing at London Underground stations and has a lot of experience in this area. LTW will conduct a three week public consultation to inform its response back to ARL

No final decisions will be made until the consultations have been completed and the results have been analysed and considered. The resulting plans will be thoroughly communicated before any changes are made

How does it affect Lewisham (the East London Line)

The statutory consultation sets out proposals to close the ticket offices at 51 stations that fall below the DfT's 'busy' threshold of 12 ticket sales per hour throughout the day. A poster will be displayed in each station where a ticket office has been proposed for closure, this includes:

Honor Oak Park

ARL is still considering options for the 14 London Overground stations where ticket sales exceed the DfT's 'busy' threshold for part of the day. Options for these may include reducing the opening hours. Any reduction in opening hours would be subject to a separate statutory consultation at a later date, these include:

New Cross Gate
Forest Hill
Sydenham
Brockley

Accessibility

By having staff visible and available in those parts of the station that customers really need them they will be better placed to help all customers, whatever their needs. TfL and ARL will ensure that the needs of vulnerable customers are fully taken into account as part of the review and the final proposal will include details of how these needs would be met. Accessibility and the need to continue to provide a 'Turn up and Go' service for customers who need extra assistance is an important factor that will be considered as part of this process. The review of the staffing model is underway and there are no firm proposals to share as yet. Details of staffing numbers will depend on a number of factors, including the outcome of statutory consultation, demand for customer assistance, the presence of ticket gatelines, the need for platform supervision and safety considerations

Ticket machines

All self-service ticket vending machines across the London Overground network are in the process of being upgraded or replaced to significantly increase the range of ticket options available. Functionality will include the sale of tickets to all National Rail destinations, advance tickets, Oyster and paper weekly and Oyster monthly travelcards, Oyster top-up and printing out tickets ordered online. Each station will have multiple machines so others can be used if needed. Staff will be trained to help customers use the machines. If a product or service is not available on the machine, staff will be trained to inform customers of alternative ways of obtaining that product or service

Learning from Fit For the Future/London Underground

ARL has reviewed the learnings TfL and London TravelWatch have shared on London Underground's Fit for the Future Stations programme, and is carefully considering these as it designs the Customer Journey Modernisation programme. Pre-engagement with staff and unions has been taking place since the end of last year/beginning of this year. The consultation run by London TravelWatch will give customers and stakeholders the opportunity to feed back their views before any decisions are made. ARL and London Underground teams are working closely together on delivering this type of change

The London Overground stations in Lewisham has been the focus of discussions with councillors and Vicky Foxcroft MP who has also been made aware of the proposals. It would be very useful if I can invite someone involved in developing these proposals to brief you at a further meeting so your response to the consultation is as well informed as it can be

Please contact me any time. Best wishes, Simon

Simon Mouncey

Community Partnerships Specialist


Transport for London

Floor 8 R1, 5 Endeavour Square Stratford London E20 1JN

t 020 3054 0947/ int 80947

e simon.mouncey@tfl.gov.uk

w tfl.gov.uk

 Help to save paper - do you need to print this email?

TfL's values are leadership, operational excellence, service and humanity

TfL's purpose is to keep London working, growing and to make life in London better

<image002.png> If you are a carer or know someone who is our staff network can help, email 'Carers SNG'

Florence Eshalomi AM
London Assembly Member for Lambeth & Southwark

City Hall
The Queen's Walk
London SE1A 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk

London Travelwatch
169 Union Street,
London SE1 0LL

Our ref: FE/SM
Your ref:
Date: 11th October 2018

Dear Travelwatch,

Planned closure of ticket offices at 51 London Overground stations – Labour Group Response

This consultation leaves several unanswered questions and as a result Labour group are unable to support the proposals.

Staffing levels

The Concession Agreement between TfL and Arriva Rail London deals with staffing issues as follows:

3. STAFFING OF LONDON OVERGROUND STATIONS Standard 3.1 The Operator shall at all times during the Concession Period provide appropriate staffing at London Overground Stations so as to ensure that: (a) it can efficiently comply with any of its safety, customer service and operating obligations under this Agreement, any Licences and any applicable Law; (b) it can provide high levels of passenger reassurance; and (c) it meets passenger requirements and customer expectations.

However, the agreement does not specify how many staff are needed, over and above ensuring that there is one member of staff available on every single station always.

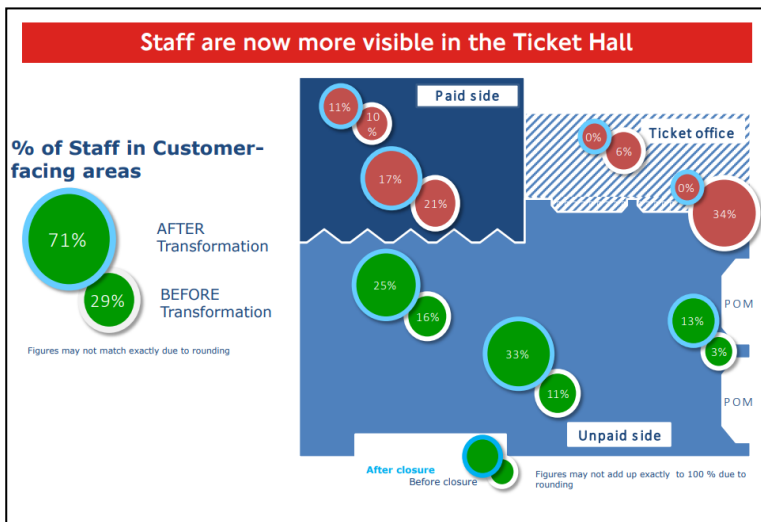
The consultation document says

The availability of staff to carry out customer service duties would be enhanced by the removal of an obligation to be within a Booking Office. It would be more cost effective to employ staff in the pursuit of the above, rather than to staff a ticket office

Unfortunately, the consultation does not explain how many staff work on stations now, with a breakdown between those inside and outside of the ticket offices and what the proposed staffing model will be in the future. We are surprised that this is not the case, given the Fit for the Future programme on London Underground.

Direct telephone: 020 7983 4427 Fax: 020 7983 4418 Email: Florence.Eshalomi@london.gov.uk

There TfL provided details on how many roles would go and the split of current/future staffing levels on the paid/unpaid sides of the station.



In their Customer Journey Modernisation Station Review the RMT/TSSA state, "Arriva Rail London were, and still to this day reluctant to discuss proposed staffing levels".

It is very concerning that this consultation does not give any figures on the staffing levels or roles that are in place now and will be in place after the proposed changes. Without know what the "appropriate staffing" levels are before and after these proposed changes we will not know what sort of effect they will have on passenger reassurance and customer expectations.

We have asked TfL for this information and have been given the following information

Current staffing levels

There are currently around 350 permanent Arriva Rail London (ARL) employees who work in various grades and roles to provide customer service on London Overground There are around 200 full time equivalent positions currently covered by agency staff

Future staffing levels

As part of the Customer Journey Modernisation programme, ARL will seek, and consult on, a simplified staffing model that would increase the number of staff it directly employs in permanent roles and reduce the reliance on agency staff. ARL will seek to redeploy all staff to new roles and make reasonable adjustments to enable this wherever possible

Proposed staffing levels will take account of a number of factors, including the outcome of statutory consultation, demand for customer assistance, the presence of ticket gatelines, the need for platform supervision and safety considerations

Where ARL is given permission to close Ticket Offices, it will look to redeploy affected staff into new positions which will be multifunctional and flexible, and staff will receive a comprehensive package of training and development

Agency staff will have the opportunity to apply for any vacancies created as a part of the programme

We are not sure why this information could not have been included in the consultation document. We have noted that there does not appear to be a plan for future staffing levels.

This is a mistake. London Underground cut 777 workers in 2016 when they closed their ticket offices and then had to employ an extra 650 staff in 2017 when they realised the cuts were affecting customer service.¹ Without a solid plan on future staffing the same thing could happen with London Overground.

Ticket Machines

The consultation says

Current levels of accessibility to facilities for the sale of fares will be maintained through the Ticket Vending Machine provision at the station, which matches the demand profile of the station, and TfL's existing suite of online and app-based functionality.

This suggests that not every ticket will be available at the Ticket Vending Machines. The consultation continues

Currently, 99% of products sold at these stations can be migrated to the fleet of Ticket Vending Machines

The consultation includes a graph entitled "Percentage of ARL ticket office sales, by product available at TVMs" which suggests Monthly Season Ticket and Railcards cannot be purchased via the Ticket Vending Machine.

The consultation should be clearer in explaining a) what ticketing products cannot be sold by the Ticket Vending Machines and b) ranking those products in terms of the demand profile of the network so we can see how many transactions would be affected.

We asked TfL to clarify this point and they provided the following information.

Demand for different ticket types and their availability on ticket vending machines

Please see the attached list showing the demand for different ticket types at all London Overground ticket offices. Please note that this includes those ticket offices which are not part of this consultation. ARL is working on solutions to close the gap even further through further upgrades to the ticket machines.

¹ <https://www.bbc.co.uk/news/uk-england-london-39491219>

Product	Percentage of TO transactions	Will TVMs fulfil in future?	%age of TO transactions unable to be conducted on TVMs
Oyster Top up	59.815%	Y	
Return	14.654%	Y	
Weekly Season	11.737%	Y	
Single	8.136%	Y	
Monthly Season	3.131%	Y*	
Advance	1.071%	Y	
Travelcard	0.519%	Y	
Railcard (NB - railcard discounts are available on TVMs)	0.433%	N	
London Bus Pass	0.264%	Y	
Annual Season	0.118%	N	
Platform Ticket	0.050%	N	
Supplement	0.022%	N	
Excess	0.020%	N	
Group	0.013%	Y	
Odd Period Season	0.008%	N	
Promotion	0.004%	N	
Accounting	0.003%	N	
Penalty Fares	0.002%	N	
Rover	0.001%	Y	
Grand Total	100.00%		0.66%
			(excludes priv rate and new monthly seasons)
Y* renewals only			

While 0.66% of tickets will no longer be able to be purchased, the consultation does not explain how those people will be able to buy those tickets in the future. The consultation also does not address several points raised by the RMT. Passengers;

- May not be able to access all the tickets and services needed from a ticket machine
- Find it harder to obtain advice on tickets and fares
- Would be frustrated that there were insufficient numbers of ticket machines
- Would experience more delays and concourse congestion
- Who are disabled, elderly and vulnerable may be less confident using a ticket machine and may end up overspending or being deterred from travelling

The response to the consultation should added all these points to ensure that the most vulnerable customers do not suffer a worsening in the service levels they experience.

Lesson Learned

In October 2017 the Mayor said, “As you know, last year I asked London TravelWatch to carry out an independent review of changes to staffing at Underground stations, including closing ticket offices. TfL is working through the recommendations of the review to ensure the most appropriate service is provided to customers. We are incorporating the lessons learnt from the Underground into the Overground's Customer Journey Modernisation programme.”

The consultation does not mention the review and so it is unclear to us what lessons they are incorporating into their plans. The main recommendations were

- If the recommendations are implemented, London Underground can effectively meet passenger needs without the need for a comprehensive network of ticket offices
- Passengers can benefit from the changes to how London Underground operates its stations, but only if the recommendations listed in this report are implemented
- The full programme of ticket office closures was carried out before all accompanying elements were in place, particularly the updating of ticket machines to provide the necessary functionality and to be reliable enough to cope with the extra demand
- If it is not possible to address the key issues outlined in this report, then it may be necessary to re-open some ticket offices.

Furthermore, the number of ticketing products that can be sold for a London Underground journey versus the number that can be sold for a rail journey are very different. The consultation does not address this issue, it merely highlights the fact there will be “appropriate staffing”.

TfL have told us that

ARL have regular meetings with LU
The 14 London TravelWatch recommendations will be carefully considered alongside consultation feedback and union discussions as ARL develops its plans
We'll be able to respond to each of the recommendations around the time that plans are confirmed, following consultation and union engagement

It appears to us that TfL are not handling this process in the most efficient way. Surely it would have been better to develop their proposals, based on the lesson learned from London Underground, and then gone out to consultation, rather than only look at the London Underground experience after the consultation.

Due to the lack of transparency about these proposals Labour Group are currently unable to support them. We hope that TfL will address our concerns before the next stage of the process, so all passengers can be sure of what exactly is being proposed and how it will actually affect them.

Yours sincerely,

Florence Eshalomi.

Florence Eshalomi AM
London Assembly, Lambeth & Southwark

LONDON
09 OCT 2018
TRAVELWATCH

Hackney Pensioners' Convention

Chair – Paul Higgins, Secretary Nigel Gansell
Treasurer – Jonathan Malins-Smith

For the attention of
Campaigns Director,
LONDON TRAVELWATCH,
169 Union Street, SE1 OLL

October 6th, 2018.

Dear Campaigns Director,

**RE PROPOSED CLOSURE OF 51 BOOKING OFFICES ON LONDON
OVERGROUND BY ARRIVA LONDON /**

The Convention, at its general meeting held earlier this month decided to back the campaign organised by RMT union to safeguard the guards on the Southern Trains network with a motion and support to Mick Cash, Gen Sec of RMT.

Unfortunately I was unaware of the planned closure of ticket offices on LONDON OVERGROUND until I read it the following day of our meeting in the ISLINGTON TRIBUNE newspaper.

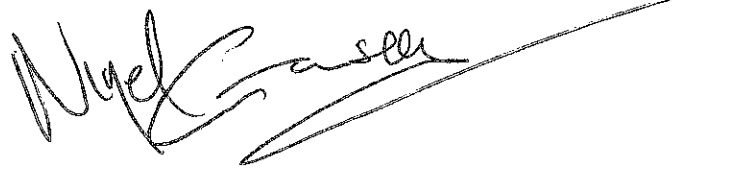
I perused your website and spotted the Consultation procedures run by TRAVEL WATCH to oppose the proposals by ARRIVA LONDON.

I am unclear whether this letter will be enough to voice HPC concerns and to back your Campaign to keep the ticket offices fully open to the elderly, disabled etc.

Our Chair Mr Paul Higgins and myself have been railways fans and supporters over many many years. We are planning a general meeting in the New Year on local travel problems in LB of Hackney and pan-London etc. If you would like to support us and even attend our next meeting [Leaflet is enclosed.] please let me know. Regards,

Yours sincerely

Nigel Gansell Sec 0743 241 6084.



ps. Do you have any stickers,
Badges, you could supply
us with?



Rt. Hon Joan Ryan MP

House of Commons

London, SW1A 0AA

Tel: 0207 219 2442

Email: joan.ryan.mp@parliament.uk

11 October 2018

Mr Arthur Leathley
Chair, London TravelWatch
169 Union Street
London
SE1 0LL

Dear Mr Leathley,

I note Arriva Rail London's plans to close ticket offices at 51 London Overground stations.

I am writing to formally submit my views to London TravelWatch's consultation on this matter, specifically relating to the proposed closure of Turkey Street station's ticket office in my constituency.

I am concerned that the possible closure of this ticket office may result in fewer on-site staff and public confusion about their duties, as well as less visible sources of assistance for passengers.

Firstly, although I understand that Transport for London (TfL) have stated that "*all stations will continue to be staffed from 15 minutes before the first train of the day until 15 minutes after the last*", will the closure of these ticket offices result in *fewer* staff being on-site during the course of the day? If not, can you guarantee that TfL have no intentions to reduce the number of staff at Turkey Street station?

As many passengers require advice on tickets, train times and delays on a daily basis, who will they be able to receive assistance from? What will the duties of staff be if they are not in the ticket office, and can you confirm that on-site staff will be able to assist with these enquires?

Finally, what provisions are being put in place to maintain and improve safety and accessibility at Turkey Street station?

Thank you for your consideration on these important issues, I look forward to hearing from you.

Yours sincerely,

Rt. Hon Joan Ryan MP
Member of Parliament for Enfield North

c.c. Heidi Alexander, Deputy Mayor, Transport and Deputy Chair, Transport for London



KATE OSAMOR MP

HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Tim Bellenger
Director, Policy & Investigation
London TravelWatch
169 Union Street
LONDON SE1 0LL

9 October 2018

MP Case Ref: ED/ZA34754

Dear Mr Bellenger

RE: Mr John Stanford

I have been approached by my constituent, above, regarding concerns about plans to close 51 ticket offices at stations across the London Overground network.

I understand the ticket offices affected are:

Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

You will be aware that this list includes stations in my own constituency and in Enfield.

As indicated by my constituent, these are potentially damaging and detrimental cuts.

Clearly there is a need for staffed ticket offices at stations. I am aware, from my own experience and that of many of my constituents, of the need for – and importance of – staff at stations, not least in helping to provide a safe and secure environment. Moreover, passengers need information, help and assistance in procuring tickets and travel routes.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will limit the quality and range of services available to passengers.

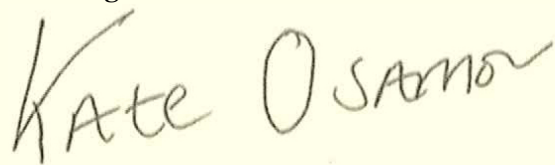
Other concerns raised include:

- (1) concourse congestion
- (2) delays
- (3) no advice/information point in assisting passengers with their journeys
- (4) demand exceeding supply, with long queues for machines, exacerbating delays
- (5) faulty machines, affecting ability to travel
- (6) additional difficulties for the elderly, disabled and vulnerable who may need added assistance
- (7) safety and security issues and increased ASB where stations are unstaffed and/or understaffed.

My constituent has asked me to draw his concerns to your urgent attention when considering this statutory consultation. I undertook to do so.

I would be grateful, also, for a reply, addressing all the issues raised – issues which I strongly ask are considered.

Kind regards

A handwritten signature in black ink that reads "Kate Osamor". The signature is written in a cursive, slightly slanted style.

KATE OSAMOR MP
Member of Parliament for Edmonton



London Travel Watch
By email to:
consultations@londontravelwatch.org.uk

Alex Crush
Transport Policy & Development
Manager
London Borough of Lewisham
Laurence House
Catford
London SE6 4RU

alexandra.crush@lewisham.gov.uk

18 October 2018

Response to the consultation on planned closure of ticket offices at 51 London Overground stations

Dear Sir/Madam

This letter sets out the London Borough of Lewisham's response to the consultation on the proposed ticket office closures at a number of London Overground stations. It should be noted that this letter replaces our previous response of 11 October, in order to take on board the views of our Members that were raised at a Council meeting, the details of which were only recently made available to officers.

The only station within the London Borough of Lewisham to currently be affected by this proposal is Honor Oak Park station. However, the proposed closures at Anerley, Penge West, Rotherhithe and Surrey Quays are also likely to impact many Lewisham residents. Some residents will also use stations across the whole of the Overground network for daily journeys, including the 51 stations where this service cut is proposed.

Although it is recognised that there are some potential benefits in the approach put forward, the Council believes that these cuts will be particularly damaging to certain groups within the community, meaning that on balance there is still a need for staffed ticket offices at stations.

The Council supports the three core principles of customer service that form part of Arriva's Customer Journey Modernisation Programme, of which this proposal forms a part of:

- Our staff are welcoming (visible)
- Our staff are full of info (truthful)
- Our staff always go the extra mile (useful)

It is also recognised that an increasing number of passengers are changing the way in which they purchase tickets, with less reliance on ticket offices and machines at stations than there used to be. This means that there could be some benefits to passengers in giving station staff more flexibility to move around the station so that they can be where they are most needed by passengers at the time. It is understood that 99% of ticket types can be bought from the ticket machines, and that members of staff would still be on hand to support customers using these machines, as well as being able to provide other assistance to passengers, as required. However, given the choice between purchasing tickets at a ticket office and from a machine, it is understood that industry research shows the majority still prefer ticket offices.

Strong concerns have therefore been raised by a number of local Ward Members, which was put forward as a motion to Council and agreed. In summary the concerns are that residents of Lewisham:

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- those who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Further information is therefore required on the number of ticket machines proposed to be provided at Honor Oak Park station and other stations to ensure there is a degree of resilience in place, for instance if one or more of the machines were to break down. Assurances are also required that the ticket machines will be well maintained, and that any issues with the machines beyond the capabilities of the station staff will be resolved in a timely manner.

It will also be important to understand through the consultation which ticket types cannot be purchased via the machines, and to ensure that passengers are aware of the other channels available to them.

Lastly, it would be important to comprehend if there are any other issues that are normally dealt with by ticket office staff that could not be as easily addressed through the new arrangements.

I'd be grateful for a response on the above matters from TfL, who are copied into this consultation response. However, even if the above questions can be addressed, the strongest reservation is the impact it has on the most vulnerable user groups, as we would not wish to see them discouraged from rail travel. The Council therefore calls upon the GLA and TfL to reconsider these proposals and continue to provide the best possible and safest Overground service to the people of Lewisham and London.

Yours faithfully

Alex Crush

Transport Policy & Development Manager

Cc:

Simon Moss, London Borough of Lewisham

Simon Mouncey, Transport for London



Peter Taylor - Liberal Democrat Elected Mayor of Watford



Town Hall, Watford, WD17 3EX

T: 01923 278371

themayor@watford.gov.uk

watford.gov.uk/electedmayor

[f petertaylorwatford](https://www.facebook.com/petertaylorwatford) [@WatfordMayor](https://twitter.com/WatfordMayor)

London Travelwatch
169 Union Street
London
SE1 0LL

Enquiries to Nick Sutton
Phone no 01923 278580
Our reference NS/ 008
Your reference

Date
22/10/2018

LONDON
24 OCT 2018
TRAVELWATCH

Dear London Travelwatch,

RE: London Overground Station Closure Motion to Full Council

At a meeting of Watford Borough's Full Council on 16th October, a motion was unanimously passed condemning potential plans to close ticket offices at Watford High Street and Carpenders Park stations. I've enclosed the motion in full for your reference in this letter.

As part of this motion, I have been asked to write to you expressing the council's concern at these plans.

Manned ticket offices provide a very important amenity to local residents travelling on your rail services. They help vulnerable older or disabled residents with ticketing enquiries and help maintain passenger safety at stations.

In particular, I am concerned about the impact that removing ticket offices would have on Watford residents living with Dementia. One of my key priorities as Mayor is to make Watford a more Dementia Friendly Town. Research carried out by the Alzheimer's Society shows that one of the biggest challenges for someone living with Dementia is using public transport. Someone living with Dementia would find buying a ticket or using an Oyster difficult and may often need assistance from trained staff. If staffing were to be removed, many residents living with Dementia would not be able to use Overground services in the town.

As a council, we are also concerned at the three week consultation time. Residents and interested stakeholders should have had longer in order to examine the plans and give responses to your survey. I hope you would consider running further consultations before a final decision is made. As a council, we would also be keen to have a copy of any Equality Impact Assessments that have been undertaken by Arriva or TfL as part of this decision.



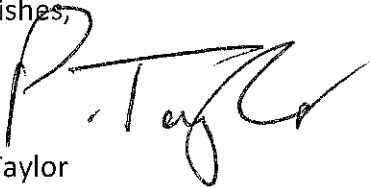
INVESTORS
IN PEOPLE | Gold



Over 1000 residents have signed a petition condemning the decision, as well as all Watford Borough councillors voting for this motion. On behalf of Watford Borough Council, I would like to make clear our opposition to this decision.

I look forward to hearing from you.

Best wishes,

A handwritten signature in black ink, appearing to read 'P. Taylor', written over a faint, illegible stamp.

Peter Taylor
Elected Mayor of Watford

London TravelWatch
169 Union Street
London
SE1 0LL

please reply to:
70 Dynevor Road
Stoke Newington
London
N16 0DX

consultations@londontravelwatch.org.uk

roger.blake@railfuture.org.uk

Date 12-10-2018

Dear London TravelWatch,

Planned closure of ticket offices at 51 London Overground stations

Railfuture is the leading national independent voluntary organisation campaigning for a better railway across a bigger network for passenger and freight users in order to support economic growth, environmental improvement and better-connected communities.

We appreciate the opportunity to contribute through this consultation to a decision on the future of some of London Overground's ticket offices. We note that the online survey will usefully capture individuals' responses on their personal experience at a particular station.

Railfuture notes that for Transport for London 'every journey matters'; for Railfuture, every passenger matters. We advocate a railway where an industry-wide commitment to excellent customer service is front and centre of every part of the railway's culture. For London Overground in particular Railfuture has always welcomed the commitment to station staffing throughout all operational hours, a commitment which this consultation assures remains and without qualification.

Railfuture has also noted the similar transition to alternative models of retailing tickets and other 'permits to travel' such as Oyster, and associated customer service, on London Underground, together with London TravelWatch's review published in December 2016 to ensure that early deficiencies were addressed. London in general and TfL in particular therefore have experience of a previous similar transition. TfL and London Overground, albeit mostly through the previous concessionaire, also have extensive change-management experience in successfully modernising the working practices of other front-line, customer-facing staff through for example the evolution to a one-person-operated train fleet serving all of London Overground's routes.

In consideration of the above together with the evidence supplied by the operator ARL in '*Information in support of a Statutory Consultation regarding a Major Change Proposal*' Railfuture is therefore able to offer general support for the proposals. We note that several London Overground stations – nine of the twelve along the Barking-Gospel Oak line and three at the southern end of the West Anglia line – do not have ticket offices yet growth in the usage of those stations appears to continue unabated.

We do however question the advisability of simultaneously closing all ticket offices in the same locality, and advocate the retention of at least one for a period of some months during which an assessment can be made of any changes to its usage and long-term viability as a service to passengers.

www.railfuture.org.uk www.railfuturescotland.org.uk www.railfuturewales.org.uk
www.railwatch.org.uk

As an example, two London Overground stations, each in the top 100-busiest in Britain and in the same town centre, are both proposed for closure. Dalston Kingsland with 2016/17 ORR estimated usage of 6.2 million (82nd-busiest) and Dalston Junction with estimated usage of 5.3 million (92nd-busiest) in our view warrant a 'stay of execution' for Dalston Kingsland, pending a further review if Dalston Junction is closed. Similarly, Hackney Central with estimated usage of 4.8 million (102nd-busiest) and Hackney Downs with 3.9 million (132nd-busiest) would in our view justify a 'stay of execution' for Hackney Central (directly-connected with Hackney Downs since July 2015). From the submitted Appendices it appears that ticket office availability at Dalston Kingsland already needs remedial action, as do the TVMs at both central Hackney stations.

There is also the wider concern, especially for those stations left reliant on TVMs, with the accompanying need for well-trained station staff fully conversant with what the TVMs can and cannot retail, that the fullest possible range of national rail products, and discounts, is readily available.

Subject to those provisos, Railfuture would be content in principle for the proposals to proceed. It will probably be helpful if, as with the London Underground example, London TravelWatch carry out an implementation review after, say, six to twelve months. That review could include an assessment of whether or not any ticket offices given a 'stay of execution' have, as a result of the closure of their nearby neighbour, subsequently become officially 'busy' through increased ticket sales going above the 12 per hour threshold, and therefore justify retention.

Yours faithfully,

Roger Blake
Railfuture
Director, national Board
Vice-Chair, London and South East regional branch



Janet Cooke
Chief executive
London TravelWatch
169 Union Street
London
SE1 0LL

LONDON
11 OCT 2018
TRAVELWATCH

11th October 2018

NP R2/1BO

Dear *Janet*

Arriva Rail London Overground Station ticket offices closures

I am writing in response to your recent consultation on the proposals from Arriva Rail London (ARL) to both close 51 ticket offices across the London Overground network. This is as a result of Transport for London's activation of the ticket office 'priced option' in ARL's contract.

I am seriously concerned that the display of posters by ARL encouraging responses to this consultation have been limited and in many cases less than prominent. With a large amount of detailed text they are not immediately designed to engage. Most passengers said they were unaware of the proposals when RMT sought to raise awareness with passengers about what was going on.

The voice of the workers on the Overground Stations

Since announcing their intention in the quaintly named 'Customer Journey Modernisation Programme' (CJM) ARL have conducted a station by station review alongside the trade unions and the resulting joint RMT/TSSA report is attached to this letter. I would be grateful if you could read this carefully as it has been written by the ticket office and station staff who work on London Overground. I would specifically draw your attention to its clear conclusions and recommendation, which is not to go ahead with these proposals.

The section on the increase in crime (page 13) is especially important to note along with the points of refuge /safety section on page 15. However it is important to also read the latest British Transport Police report which came out on the 5th October and



The services provided by Ticket Vending Machines (TVM) are analysed on page 25 of their report and it is abundantly clear that there are serious issues to be addressed with the range of services, with ticketless travel and fare evaders that must be properly addressed by ARL before any decision is made.

The million exit and entries benchmark

RMT welcomed your report into Small Stations last year which significantly said:

“The 1 million passenger entries and exits figure is a rough borderline between those stations that justify the provision of automatic ticket barriers, staffed ticket offices throughout the operational day and other traits normally associated with larger stations”².

With a staggering 128 million exits and entries in 2016/17 across all of these 51 stations, including 40 stations with well over a million exits and entries, it must follow that all these stations need staffed ticket offices and to agree their closure would fly in the face of your own benchmark.

Ticket Vending Machines

RMT also wishes to highlight that Office for Road and Rail research into passenger's experience of ticket vending machines saw a deterioration of overall satisfaction over the year from March 2017 to March 2018 from 77% to 75%.³ This is the same period in which the Action Plan launched by Rail minister Paul Maynard was implemented and designed to improve the passenger experience of fares and ticketing⁴. RMT believes strongly that this shows there is still much work to be done.

ARL in their consultation document claim otherwise and quote the Secretary of States guidelines back at passengers by saying that closure of the offices would “represent an improvement on current arrangements in terms of the quality of service”.

¹ http://media.btp.police.uk/r/15934/british_transport_police_releases_its_annual_repo

² http://www.londontravelwatch.org.uk/documents/get_lob?id=4401&field=file

³ Office of Rail and Road Research into Passengers' Experience of Ticket Vending Machines Report of Findings March 2018 page 6

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/669746/action-plan-information-on-rail-fares-ticketing.pdf

We would point out that the actual guidelines require “the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness and members of the public would continue to enjoy widespread and easy access to the Purchase of Rail Products, notwithstanding the change”.

RMT do not believe, and will outline below why this would not be the case under these proposals. ORR would also appear to agree with us and on the 13th September 2018 announced that it will press industry to improve competition, value and innovation in automatic ticket gates (ATGs) and ticket vending machines (TVMs). Noting that both pieces of equipment are key parts of the passenger experience – their functionality and capability impacts on the safe flow of passengers through stations and the roll out of new smart ticketing solutions they announced from the emerging findings in their market study into ATGs and TVMs that:

“the market for ATGs is a near-monopoly with weak competition, with buyers of gates potentially paying too much. For TVMs, we expressed concerns about service quality and the availability of machines.”⁵

ORR wants to make the market for ATGs and TVMs more competitive in order to promote innovation and the development of new products. ORR proposes to work with industry to take forward significant change in how competition works in these markets, including how equipment is purchased, to generate more incentives for suppliers to invest and compete, and to ensure that alternative suppliers with new ideas are not deterred from entering the rail retail industry.⁶ RMT believes there is still much more to do and the market is neither ready nor capable of replacing ticket offices or the full range of services they currently provide.

The problems with the Ticket Vending Machines

We do not believe ARL’s claim that upgraded ticket machines and staff on platforms can perform safely the full range of the tasks currently carried out at ticket offices.

Whilst technology is improving, the words of ORR from 2 years ago are still valid. The ORR said: “While millions of tickets are purchased using ticket vending machines without obvious problems being encountered, it is equally clear that further improvements in the information provided by such machines – such as clearer

⁵ <http://orr.gov.uk/rail/publications/research-and-studies/monitoring-markets/supply-of-automatic-ticket-gates-and-ticket-vending-machines-market-study>

⁶ <http://orr.gov.uk/rail/publications/research-and-studies/monitoring-markets/supply-of-automatic-ticket-gates-and-ticket-vending-machines-market-study>

information on ticket restrictions and less use of industry terminology or jargon – would assist passengers in making the best decision when buying tickets.”⁷

In the most recent survey conducted by ORR mystery shoppers were asked how easy it was to obtain the information on the TVM about on- and off-peak times. Less than half the sample (40%) found it to be easy to find information on peak and off-peak times, although a quarter of the shoppers (25%) didn't feel strongly either way, and a total of 35% found obtaining this information on the TVM to be either 'Fairly Difficult' (15%) or 'Very Difficult' (20%).

In the same survey mystery shoppers were also asked if information was provided on the TVM indicating that other fare options, including cheaper fares, might be available from the ticket office⁸.

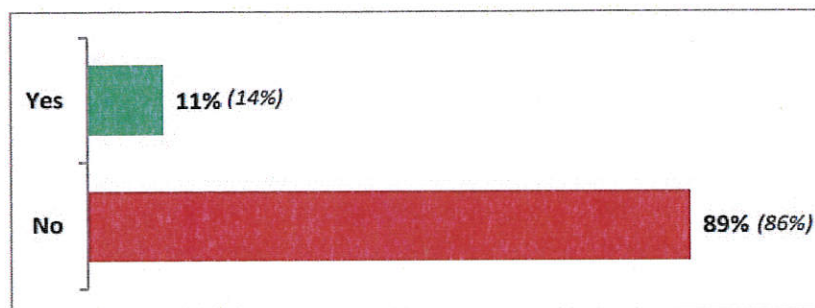


Figure 5 – Was information provided on the TVM, indicating that other fare options, including cheaper fares, might be available from the ticket office?

(Base: Total Sample: 739)

The majority of shoppers (89%) did not see information on the TVMs around other fare options possibly being available from the ticket office, an increase of 3% points on last year's survey.

Specifically, the following are areas of concern have been given to us by staff and passengers which should be read in conjunction with pages 23-26 in the attached RMT & TSSA report. This is a non-exhaustive list of the tasks that are currently performed at ticket offices, but which cannot always be carried out at ticket machines or on mobile hand held devices:

- Buy railcards and annual season tickets

⁷ <https://www.theguardian.com/uk-news/2016/jun/02/train-ticket-machines-need-clearer-language-jargon-study>

⁸ http://orr.gov.uk/_data/assets/pdf_file/0019/27334/esa-retail-research-into-passengers-experience-of-ticket-vending-machines-march-2018.pdf

- Produce the photo ID cards which are essential for season tickets of a month or longer to be valid.
- Odd period season tickets (longer than 1 month - e.g. 6 weeks and 5 days)
- Season ticket changes - e.g. customer wishes to increase/ reduce the number of zones of their season ticket
- Get refunds Take Rail Travel Vouchers as payment.
- Take National Transport Tokens as payment
- Cancel a ticket for immediate refund if a mistake is made at the TVM.
- Retrieve lost money from malfunctioning TVMs.
- Make seat reservations
- Make sleeper reservations
- Issue Carnet tickets
- Issue all line Rover tickets
- Issue company specific Rover tickets
- Issue Ranger tickets
- Make rail/sail bookings to any station in Ireland (these are walk-up fares for immediate travel)
- Issue car park tickets/give part rebates on one bought from parking machine
- Issue Groupsave tickets (these are available for discounted travel for 2, 3 or 4 people for walk up off peak travel on nearly all routes in the south east).
- Issue replacements for internet sales tickets where the TVM has malfunctioned mid-print.
- Advice the cheapest valid fare – RMT searched for how many there are for a London – Birmingham journey and counted a total of 156! All these have different validities and conditions. The machine – even if it did offer all the fares, which it will not do - won't tell you those restrictions, and even if it did, it would take a PhD and several hours to go through them, so the passenger and the queue behind you would miss their train.
- Any walk-up ticket which doesn't start from the same station, or is not for dated for same day travel. (Most TVMs do not allow this)
- Privilege tickets – most 'unsafeguarded' rail staff (i.e. those who entered service after March 1996) are not entitled to a privilege discount on oyster pay as you go fares. The only way to avoid paying quadruple the correct fare is to use the booking office or risk prosecution/penalty fares.
- Mixed tender payments - e.g. part cash and part card
- Boundary Zone Extension tickets to mainline stations (for travel card season tickets not including Zone 1)
- Discounted advance purchase tickets
- Split tickets and more complicated journeys
- Some machines don't even let you buy a ticket starting at another location. Especially frustrating if you're using your season ticket for part of the journey.
- The ability to pay with £50/ Scottish Bank notes and 1p, 2p and 5p coins
- Refunding last PAYG top-up or whole PAYG balance or using PAYG balance to offset the price of a season ticket (e.g. a customer who mistakenly topped up, when intending to purchase a season ticket)
- TVM's do not all work for those who are without a UK billing address when using a card

- Mainline discounts on single tickets
- Replacing damaged paper travel cards
- Using a ROLT/RLMP to replace a ticket lost in a ticket gate
- Purchasing some of the wide range of mainline tickets - e.g. Advance, Super-off peak, Open singles/ returns
- The acceptance of warrants
- Privilege-rate Mainline paper tickets
- The ability to purchase group tickets for more than 19 people in a single transaction
- Refunding Same Station exits (more than 30 mins)
- Excess fares window (helps deter and offset losses to fare evasion)
- ENCODE – ticket stopped working and needs replacing

RMT calls on London Travelwatch to reject these proposals given the fact that ORR is seeking feedback on its emerging findings and proposed action which it will report back on in 2019.

RMT further believes that an efficient and skilled operator, along with its client Rail for London (RfL) should be working to ensure that the deployment of staff at ticket offices is actually understood as a necessary aspect of an overall sales service, given the evidence that ticket complexity and rip-off pricing is still prevalent in the industry as well as very real serious issues regarding staff and passenger accessibility, safety and security⁹.

Cutting costs at a time of rapid growth

RMT recognises that there is clearly a desire by RFL, a wholly owned subsidiary of TfL, to close ticket offices. We believe that is simply to cut costs and try and plug a gap in TfL finances. RMT believes this is short sighted and wrong. The Overground's primary objective should be to serve passengers and external economic and social objectives related to moving about the capital. Cutting back on the level and quality of service is a false economy.

The cost of staff providing an efficient and skilled service and having a point of refuge / safe space to work from should not be identified as an inconvenient burden especially when passenger journeys on the Overground have increased overall from 102 million in 2011/12 to 190 million in 2017/18¹⁰.

RMT strongly believes Arriva Rail London should not be seeking this option and should recognise that any reduction in service is not a source of savings. Instead this

⁹ <https://www.theguardian.com/uk-news/2018/oct/02/hackney-central-knife-attack-man-stabbed-on-london-overground>

¹⁰ <http://dataportal.orr.gov.uk/displayreport/report/html/2b2e2c38-c822-4e1f-9fb4-b049b3c13899>

important role should be recognised as an essential element in providing a world class service to London citizens, visitors and tourists from around the world.

RMT's own investigation into these proposals has seen no evidence that challenge our view, but we do hear evidence, both subjective and objective from passengers, that these proposals will deliver a significant and adverse effect on levels of service and other benefits that ticket offices bring to a station in respect of security, help for the disabled, vulnerable or technically less able.

Attitudes towards staff

RMT believes all the evidence from your own passenger research and that of Transport Focus supports the view that ticket office staff are valued by passengers. It is certainly the view heavily supported in comments made on RMT postcards and petitions.

Indeed Transport Focus latest report on Passenger attitudes towards Rail staff (February 2016) makes the point that "Train tickets are sold through a number of different sales channels. In recent years there has been growth in the number of 'self-serve' channels, but at present station ticket offices remain the most popular method of purchasing a ticket.....In the course of our research for the Thameslink and Southeastern franchises we asked passengers what their preferred method of ticket purchase would be. With both operators a slightly higher proportion of passengers wanted to be able to purchase tickets online than currently do. However, the most preferred method was still the ticket office. 45 per cent of Thameslink and 55 per cent of Southeastern passengers preferred to use the ticket office. This was more than double the number, in both instances, of those that preferred ticket vending machines".

Assistance from staff in a ticket office is vital

Feedback from RMT members is that passengers are often tentative about approaching them in the ticket hall or on a platform. Even where passengers appear to want advice on a journey or using a machine, they are frequently shy about requesting assistance. Staff can take steps to mitigate this – but obviously within limits. This was of course never the case with ticket offices as the function of staff in the offices was reassuringly clear to everyone.

Where a passenger does require assistance, they frequently have to be referred to other sources of assistance – i.e. to the phone helpline (from where they are often referred back to the station) or online. This is exasperating for them and undermines passengers having a positive perception of the service we can provide as well as the way our railways are run.

In terms of visually-impaired people, where ticket offices are retained, people can learn the route to the ticket office window, but where ticket offices have been removed our members report that such customers are struggling to locate mobile

staff. Furthermore, ticket machines are touch-screen and do not always deploy audio or tactile operation technology, so cannot be used unaided by many visually-impaired people.

In terms of hearing-impaired people, ticket office windows have induction loops, but obviously a mobile member of staff does not. In terms of mobility-impaired people, the design of ticket machines (e.g. absence of a level counter for sorting change) is inadequate. We therefore believe that the steps which will be taken to accommodate disabled users is insufficient to mitigate the loss of ticket offices.

Accessibility

Train and station operators are required by their operating licences to establish and comply with a disabled people's protection policy (DPPP). This sets out the arrangements and assistance that an operator will provide to protect the interests of disabled people using its services and to facilitate such use. ORR approve these policies and monitor compliance with them. A DPPP sets out in detail the arrangements that an operator will put in place to support disabled people using its services. Ensuring that ORR's licensees fulfil the commitments they make to disabled passengers in their DPPPs is a key aspect of ORR's regulatory work.

Each DPPP includes a requirement that all licensed operators must:
'Provide assistance to disabled passengers who arrive at a station and require assistance to allow them to travel, but assistance has not been arranged in advance, where reasonably practicable.'

This type of 'un-booked' assistance is commonly referred to as 'Turn-up-and-go' (TUAG). All ORR's licensees with a DPPP are expected to offer this service.

ARL's current DPPP states for example "If you hold a Disabled Persons Railcard (www.disabledpersons-railcard.co.uk), please remember to show it when purchasing your ticket at a ticket office". It also makes clear that 28 of the stations listed have an accessible ticket office and counter. RMT is concerned that the problems this decision could create exposes the contradiction inherent in ARL's DPPP which is rightly proud of the fact that "Accessible ticket office windows have been installed at Brondesbury Park, Gospel Oak, Headstone Lane and Queens Road Peckham" only for closure to be proposed.

If the service provided to disabled people by ticket offices is removed this means there will have to be a significant change to the DPPP. RMT's reading of the licence is that ARL shall not establish, or make any material changes to the DPPP unless and until: (a) the PC and, where appropriate, London Transport Users Committee (now London Travelwatch) has been consulted; and (b) the licence holder has submitted the DPPP, or (as the case may be) the proposed change, to ORR and ORR has approved it.¹¹

¹¹ http://orr.gov.uk/data/assets/pdf_file/0011/2234/lic-passlic.pdf page 8

We would request a clear statement from London Travelwatch clarifying whether any decision taken as part of this consultation will be seen as the consultation to the DPPP required in the licence conditions above or if this will be seen as a separate process?

RMT will also be writing to the ORR on the significant detriment proposed to the DPPP and call on both parties to reject these proposals.

Congestion, queueing and safety fears

Not all ticket halls are also suited to the placing of large ticket machines and transactions are much more likely to be held up causing queues and requiring staff assistance to correctly complete. Most passengers are not aware of what the industry's guidelines are regarding queueing in peak and off-peak. It would be interesting to know if ARL are monitoring the queues at station as expected by the railway industry.

The lack of ticketing facilities could also impact on revenue if station staff are instructed to let customers travel without valid tickets. This situation regularly occurs at stations and persists for prolonged periods on occasions. We anticipate that the accumulated impact on revenue, will likely have negative consequences for the provision of services.

There are also reasons related to the layout and local setting of the stations that make the case for retaining ticket offices therein especially persuasive. One factor is deterring crime against passengers. We agree with the concerns in this regard of Dawn Butler, MP for Brent Central, remembering the appalling murder of Tom Ap Rhys Pryce¹². She is correct to state that the ability of staff to safely oversee the ticket hall and safely be able to summon assistance is enhanced by staff being located in and having access to the secure confines of a ticket office.

We will not accept a heightened risk of crime, attacks and robberies by placing staff in potential danger by carrying out the same duties on platforms that have previously enjoyed the security and safety of the ticket office. Do ARL not accept there will be a heightened risk in the future?

Conclusion

We hope that as champions representing the views of passengers, you are minded to oppose the withdrawal of these ticket office services, the maintenance of which thousands of passengers reasonably believe to be in their interests. By rejecting this application and listening to the concerns felt by politicians, staff and user groups representing the disabled, elderly and others with special assistance needs you will

¹² http://www.kilburntimes.co.uk/news/dawn_butler_mp_brent_overground_ticket_office_closures_could_cost_lives_1_4374865

be standing up for all passengers. The support given to passengers and constituents by the Labour Group on London Assembly, councils like Islington and other elected representatives who have responded to this consultation is a reflection of the genuine concern felt by the removal of the ticket offices.

It is clear that the operator may seek to obtain consent from the Secretary of State to amend the TSA but to do so they have to obtain the approval of TfL to the proposal. TfL want London Travelwatch to provide the cover for them to then claim they are only adopting this approach after getting the agreement of the official watchdog.

The fears and concerns of passengers has to be recognised as valid. And the previous conclusion London Travelwatch reached in respect of stations with more than a million entries and exits said they "justify the provision of automatic ticket barriers, staffed ticket offices throughout the operational day and other traits normally associated with larger stations"¹³.

The 185 million exits and entries in 2016/17 is probably getting closer now to 200 million and they will certainly reach it before the end of this decade. RMT therefore believes all these stations need staffed ticket offices and to agree this closure now would be a failure of historic significance.

It is not acceptable to recognise the closure will have implications for passengers with disabilities or who are elderly or vulnerable but give no assurances how these matters will be addressed in the future.

Yours faithfully



Mick Cash
General Secretary

¹³ http://www.londontravelwatch.org.uk/documents/get_lob?id=4401&field=file

Station Name	Entries & Exits_Full		Entries & Exits_Reduced		Entries & Exits_Season		1617 Entries & Exits		.516 Entries & Exit	
	Exits_Full	Entries & Exits_Reduced	Exits_Reduced	Entries & Exits_Season	Exits_Season	1617 Entries & Exits	1617 Entries & Exits	.516 Entries & Exit	.516 Entries & Exit	
Acton Central	537,352	721,522	672,990	1,931,864	1,891,098					
Anerley	258,736	386,864	327,412	973,012	887,484					
Brondesbury	510,154	886,450	1,261,284	2,657,888	2,709,888					
Brondesbury Park	314,314	360,114	371,516	1,045,944	1,048,556					
Bruce Grove	207,540	382,818	510,304	1,100,662	990,150					
Bush Hill Park	326,580	392,778	318,450	1,037,808	992,280					
Caledonian Road & Barnsbury	441,754	586,710	809,478	1,837,942	1,764,760					
Camden Road	1,204,378	1,816,256	2,237,074	5,257,708	5,120,672					
Canonbury	781,826	1,285,366	938,190	3,005,382	2,859,228					
Carpenders Park	341,904	583,858	263,294	1,189,056	1,154,092					
Clapton	403,086	627,120	775,524	1,805,730	1,598,734					
Dalston (Kingsland)	1,203,628	2,672,470	2,308,250	6,184,348	5,931,382					
Dalston Junction	1,217,890	2,366,280	1,712,668	5,296,838	5,139,640					
Finchley Road & Frognal	454,716	623,488	1,055,586	2,133,790	2,199,892					
Gospel Oak	692,210	938,418	725,224	2,355,852	2,629,076					
Hackney Central	957,806	1,685,958	2,185,256	4,829,020	5,978,530					
Hackney Downs	1,129,366	1,871,346	900,682	3,901,394	2,266,824					
Hackney Wick	496,630	995,362	648,206	2,140,198	2,103,982					
Haggerston	884,466	1,407,420	931,162	3,223,048	3,187,120					
Hampstead Heath	844,900	1,342,266	1,185,058	3,372,224	3,331,658					
Hatch End	173,946	443,068	95,232	712,246	707,454					
Headstone Lane	122,722	248,264	105,520	476,506	473,014					
Homerton	1,207,604	1,930,600	1,677,372	4,815,576	4,652,282					

Honor Oak Park	815,350	1,215,800	1,040,128	3,071,278	2,969,040
Hoxton	743,016	1,325,522	927,804	2,996,342	2,931,902
Imperial Wharf	870,400	1,000,456	1,262,146	3,133,002	3,290,200
Kensal Rise	638,546	891,088	1,170,498	2,700,132	2,738,450
Kensington Olympia	1,106,210	1,516,430	1,494,968	4,117,608	10,904,840
Kentish Town West	526,182	691,032	808,558	2,025,772	2,011,132
Kilburn High Road	165,484	433,884	329,822	929,190	924,198
Penge West	171,978	289,932	235,036	696,946	640,978
Rectory Road	272,586	355,860	354,488	982,934	939,602
Rotherhithe	414,552	763,242	663,334	1,841,128	1,728,256
Shadwell	1,125,412	1,969,140	1,920,486	5,015,038	4,976,464
Shepherds Bush	1,732,554	2,717,472	3,534,016	7,984,042	8,653,428
Shoreditch High Street	1,810,334	3,378,710	2,665,960	7,855,004	7,661,254
Silver Street	400,724	599,178	580,714	1,580,616	1,389,866
South Acton	235,862	249,150	307,230	792,242	722,238
South Hampstead	84,094	157,942	181,292	423,328	456,228
Southbury	247,702	422,272	269,508	939,482	833,988
St.James' Street	263,790	418,508	477,078	1,159,376	1,016,152
Stamford Hill	135,802	221,068	222,360	579,230	503,130
Stoke Newington	339,654	510,246	517,118	1,367,018	1,165,432
Surrey Quays	902,240	1,825,210	1,943,904	4,671,354	4,214,654
Theobalds Grove	137,918	196,366	79,652	413,936	351,986
Turkey Street	212,528	320,062	178,982	711,572	603,754
Wapping	623,372	1,122,558	737,882	2,483,812	2,464,180
Watford High Street	284,916	1,044,736	113,964	1,443,616	1,441,772

West Hampstead	971,124	1,432,836	2,318,172	4,722,132	4,814,008
White Hart Lane	311,880	606,120	727,056	1,645,056	1,473,144
Wood Street	345,148	495,478	476,734	1,317,360	1,140,006